

Ron Terrell
Milestone Contractors, L.P.
5950 S.Belmont Avenue, P.O.Box 421459
Indianapolis, IN 46242

Re: 011-12584
First Minor Permit Revision to
FESOP 011-10547-00046

Dear Ron Terrell:

Milestone Contractors, L.P. was issued a permit on May 27, 1999 for operation of combination batch mix and drum mix hot asphalt plant. A letter requesting changes to this permit was received on October 16, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the fuel usage limits from a 365-day period to a twelve (12) consecutive month period and in the corresponding reporting requirements.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File - Boone County
U.S. EPA, Region V
Boone County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

**Milestone Contractors, L.P.
4312 Whitelick Drive
Whitestown, Indiana 46075**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F011-10547-00046	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 27, 1999
First Minor Permit Revision: F011-12854	Pages Affected: 29, 40-41
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

D.1.5 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.92, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the mixing and drying operations shall not discharge or cause the discharge into the atmosphere any gases which exhibit 20% opacity or greater.

D.1.6 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart I.

D.1.7 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operation shall not exceed 21.98 pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.8 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 115.0 million Btu per hour burner for the aggregate dryer shall be limited to:

- (a) 1.6 pounds per MMBtu heat input or a sulfur content of less than or equal to 1.5% when using waste oil; and
- (b) 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.5% when using distillate oil.

D.1.9 Fuel Usage [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

- (a) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,061 U.S. gallons per 12 month period, rolled on monthly basis, so that SO₂ emissions are limited below 100 tons per year.
- (b) For purposes of determining compliance, the following shall apply:
 - (1) every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO₂ emissions, such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified; and
 - (2) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO₂ emissions and a maximum sulfur content of 0.5 percent such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified.

Therefore, the requirements of 326 IAC 2-7 will not apply.

D.1.10 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP QUARTERLY REPORT

Source Name: Milestone Contractors, L.P.
Source Address: 4312 Whitelick Drive, Whitestown, Indiana 46075
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F011-10547-00046
Facility: 115 MMBtu/hr burner for the aggregate dryer
Parameter: Sulfur Dioxide (SO₂)
Limit: the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,061 U.S. gallons per 12 month period, rolled on a monthly basis. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO₂ emissions, and every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO₂ emissions.

Year: _____

Month	Maximum Sulfur Content of Waste Oil (percent)	Waste Oil Usage (gallons)	Maximum Sulfur Content of No. 2 Oil (percent)	No. 2 Fuel Oil Usage (gallons)	Natural Gas Usage (MMCF)	(1) Waste Oil and Equivalent Usage this month (gallons)	(2) Previous 11 Months Waste Oil Equivalent Usage (gallons)	(1)+(2) 12 Months total Waste Oil Equivalent Usage (gallons)
Month 1								
Month 2								
Month 3								

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

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Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Milestone Contractors, L.p.
Source Location:	4312 Whitelick Drive, Whitestown, IN 46075
County:	Boone
SIC Code:	2951
Operation Permit No.:	011-10547-00046
Operation Permit Issuance Date:	May 27, 1999
First Minor Permit Revision No.:	011-12854-00046
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a revision application from Milestone Contractors, L.p. relating to the operation of combination batch mix and drum mix hot asphalt plant.

History

On October 16, 2000 Milestone Contractors L.p. submitted an application to the OAM requesting to modify the monthly reporting form for fuel usage. Milestone Contractors, L.p. was issued a FESOP on May 27, 1999.

Enforcement Issue

There are no enforcement actions pending.

Permit Changes

The Permittee has requested to replace the language "365 day rolling total" for fuel usage with "12 month rolling total" for monitoring and record keeping requirements and forms. The OAM has agreed to revise the permit as follows (with language added shown in **bold** and deleted with ~~strikeout~~):

1. Condition D.1.9 in section D.1 is revised as follows:

D.1.9 Fuel Usage [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

- (a) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,061 U.S. gallons per ~~365-day period, rolled on a daily basis, 12 month period, rolled on a monthly basis~~, so that SO₂ emissions are limited below 100 tons per year.

(b) For purposes of determining compliance, the following shall apply:

1. every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO₂ emissions, such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified;
and
2. every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO₂ emissions and a maximum sulfur content of 0.5 percent such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified.

Therefore, the requirements of 326 IAC 2-7 will not apply.

2. The FESOP Monthly Reporting forms page 1 of 2 and page 2 of 2 are replaced by FESOP Quarterly Reporting form as shown on the next page. Page 40 of 43 of the Permit is replaced by the attached form and page 41 is left blank.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP QUARTERLY REPORT

Source Name: Milestone Contractors, L.P.
Source Address: 4312 Whitelick Drive, Whitestown, Indiana 46075
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F011-10547-00046
Facility: 115 MMBtu/hr burner for the aggregate dryer
Parameter: Sulfur Dioxide (SO₂)
Limit: the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 115.0 MMBtu per hour burner for the aggregate dryer shall be limited to 1,693,061 U.S. gallons per 12 month period, rolled on a monthly basis. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO₂ emissions, and every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO₂ emissions.

Year: _____

Month	Maximum Sulfur Content of Waste Oil (percent)	Waste Oil Usage (gallons)	Maximum Sulfur Content of No. 2 Oil (percent)	No. 2 Fuel Oil Usage (gallons)	Natural Gas Usage (MMCF)	(1) Waste Oil and Equivalent Usage this month (gallons)	(2) Previous 11 Months Waste Oil Equivalent Usage (gallons)	(1)+(2) 12 Months total Waste Oil Equivalent Usage (gallons)
Month 1								
Month 2								
Month 3								

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 16, 2000

Emission Calculations

No emission calculations are required.

Justification for Revision

The Federally Enforceable State Operating Permit is being modified through a FESOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d) (1) "...modifications that reduce the frequency of any monitoring or reporting required by a permit condition or applicable requirement.

Conclusion

This permit revision shall be subject to the conditions of the attached proposed FESOP Permit Revision No. 011-12854-00046.